

Memorandum

Date: January 13, 2012

To: Cindy Patton, TDEC Memphis

From: Steve Spurlin, OSC
U. S. EPA, Region 4

Re: American Commercial Lines, Memphis, TN
EPA Site Visit to Follow-up on Anonymous Spill Report

On January 13, 2012, OSC Spurlin visited the American Commercial Lines (ACL) facility located at 427 W. Illinois Avenue, Memphis, Tennessee. The purpose of the visit was to discuss an anonymous report of a 300 bbl oil spill with facility representatives.

OSC Spurlin met with Ms. Stacey Thomas, Facility Manager, and Mr. Sean Gallagher, Corporate Counsel, for ACL. Mr. Gallagher indicated the current status of the facility as almost non-operational due to severe damage incurred during the Spring 2011 flooding. They are currently in negotiations with their insurance carrier regarding rebuilding the facility. The current operations consist of direct transfer of vegetable oil from barge to truck and ongoing tank clean-out by an environmental contractor.

Mr. Gallagher indicate that on December 14, 2010, the #9 tank had a valve freeze resulting in a 300bbl release of #6 oil to the containment area. The facility did not report the spill because it was in containment. The oil migrated to an adjacent containment area known as "Tank 14" containment. According to Mr. Gallagher, the former facility manager contracted to have 2 vac-trucks pump the free liquid oil. Mr. Gallagher thought the oil had been transported to a Clean Harbors Services, but did not have records on hand. A significant quantity of oil residues and impacted soils remained within the large containment areas. The former manager contemplated using a bio-remediation agent; however, neither removal nor treatment in-place occurred. Rain events resulted in generation of large quantities of oily water, which typically would be processed through the on-site oil/water separator; however, the separator was not functioning during this period of time. Mr. Gallagher did not know why repairs to the separator were not undertaken by the manager.

As oily water accumulated, the facility pumped the wastewater into an adjacent unlined containment area called the "Discontinued Settling Pond". The water continued to be pumped and accumulate until it became apparent the flooding was likely to inundate the facility. According to Mr. Gallagher, a week before projected flooding, Fisher-Arnold brought vac trucks and pumped the oily water to on-site tanks. He estimated the volume to be 100,000's of gallons. The waste water was later sent to Delta for disposal.

ACL hired Fisher-Arnold to develop a remediation plan for the impacted containment area. The plan is currently under review by their insurance company. I walked the facility area with Mr. Gallagher and Ms. Thomas. Oily residues and staining were observed in 3 large containment areas. I inquired about how oily storm water is currently handled. They indicated the oil/water separator is functioning, and the water is treated and released pursuant to their NPDES permit. Mr. Gallagher was forthcoming with information, and requested, if possible, he be notified of any upcoming visits, so he could be on-hand. Ms. Thomas is new to facility and does not have historical information. Mr. Gallagher; 812/288-0599 cell: 502/774-0104. Ms. Thomas; 901/774-5460 cell: 618/521-4326.